



ROBINSON MCFADDEN
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.

COLUMBIA | GREENVILLE

May 27, 2005

HAND DELIVERED

Charles L.A. Terreni, Chief Clerk
Public Service Commission of South Carolina
101 Executive Center Drive, Saluda Building
Columbia, South Carolina 29210

Bonnie D. Shealy
1901 MAIN STREET, SUITE 1200
POST OFFICE BOX 944
COLUMBIA, SOUTH CAROLINA 29202
PH
(803) 779-8900 | (803) 227-1102 *direct*
FAX
(803) 252-0724 | (803) 744-1551 *direct*
bshealy@robinsonlaw.com

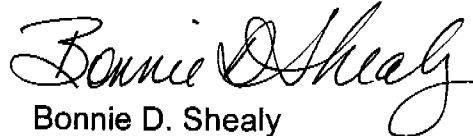
**Re: BellSouth Section 271 Docket – SGAT Withdrawal
Docket No. 2001-209-C
Our File No. 30042-0002**

Dear Mr. Terreni:

Please revise your records to reflect that Robinson McFadden & Moore, P.C. is now the attorney of record for SECCA and US LEC of South Carolina, Inc. in the above referenced docket. Enclosed for filing please a motion to substitute counsel and a petition to withdraw SECCA & US LEC's objection to the motion for adoption of the settlement of disputed claims submitted by BellSouth. By copy of this letter we are notifying all parties of record. Please stamp the extra copy provided as proof of filing and return it with our courier.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.


Bonnie D. Shealy

/bds
Enclosures

cc/enc: Terry Romine, Deputy General Counsel (via email & U.S. Mail)
Dan F. Arnett, Chief of Staff
All parties of record
Ms. Daphne Werts (via email)

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2001-209-C

In re:


**BellSouth Telecommunications, Inc.
Application to Provide In-Region
InterLATA Services Pursuant
To Section 271 of the
Telecommunications Act
Of 1996 – SGAT Withdrawal**

**MOTION TO SUBSTITUTE
COUNSEL**

US LEC of South Carolina Inc. ("US LEC") and the Southeastern Competitive Carriers Association ("SECCA")¹ move for a substitution of counsel. US LEC and SECCA request that Faye A. Flowers, Esquire, of Parker, Poe, Adams & Bernstein, LLP be relieved as counsel in this action and that Bonnie D. Shealy, Esquire, of Robinson McFadden & Moore, P.C. be substituted as the attorney of record for US LEC and SECCA.

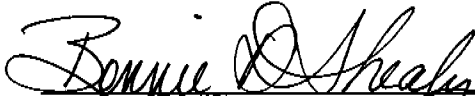
Dated this 26th day of May, 2005.

Parker, Poe, Adams, & Bernstein, LLP



Faye A. Flowers
1201 Main Street, Suite 1450
Columbia, South Carolina 29202
Telephone (803) 255-8000

Robinson McFadden & Moore, P.C.



Bonnie D. Shealy
1901 Main Street, Suite 1200
Post Office Box 944
Columbia, South Carolina 29202
Telephone (803) 779-8900
Facsimile (803) 252-0724
Bshealy@robinsonlaw.com

¹ SECCA members include Time Warner Telecom, US LEC, and XO North Carolina, Inc.

BEFORE
**THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2001-209-C

IN RE:

Application of BellSouth
Telecommunications, Inc to Provide In-
Region InterLATA Services Pursuant to
Section 271 of the Telecommunications Act
of 1996

**PETITION TO WITHDRAW OBJECTION
BY US LEC OF SOUTH CAROLINA INC.,
AND SOUTHEASTERN COMPETITIVE CARRIERS ASSOCIATION**

US LEC of South Carolina Inc. ("US LEC") and Southeastern Competitive Carriers Association ("SECCA")¹ (collectively, the "Joint Petitioners"), hereby respectively request the Commission to permit the Joint Petitioners to withdraw their objection to the Motion for Adoption of Settlement of Disputed Claims ("Motion") that has been submitted for approval by BellSouth Telecommunications, Inc. ("BellSouth") in the above-styled proceeding. The Joint Commenters are in agreement with the resolution of the disputed claims as set forth in the Motion.

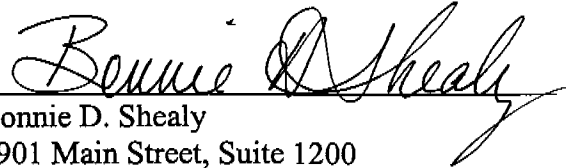
¹ SECCA members include TWTC, US LEC, and XO North Carolina, Inc.

Accordingly, US LEC and SECCA have no objections to the Commission granting the Motion and approving the settlement as submitted by BellSouth.

Dated this 2^{5th} day of May, 2005.

Respectfully submitted,

Robinson McFadden & Moore, P.C.



Bonnie D. Shealy
1901 Main Street, Suite 1200
Post Office Box 944
Columbia, South Carolina 29202
Telephone (803) 779-8900
Facsimile (803) 252-0724
Bshealy@robinsonlaw.com

Attorneys for US LEC OF SOUTH CAROLINA
INC. and SOUTHEASTERN COMPETITIVE
CARRIERS ASSOCIATION

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. Docket No. 2001-209-C**

In Re:

BELLSOUTH)
TELECOMMUNICATIONS, INC. –)
APPLICATION TO PROVIDE IN-)
REGION INTERLATA SERVICES)
PURSUANT TO SECTION 271)
OF THE TELECOMMUNICATIONS)
ACT OF 1996 - SGAT)

CERTIFICATE OF SERVICE

This is to certify that I, Mary F. Cutler, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Motion to Substitute Counsel and Petition to Withdraw Objection on behalf of US LEC and SECCA** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Florence P. Belser, Esquire
General Counsel
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC 29211

Sonia Daniels
Law & Government Affairs
AT & T – Southern Region
1200 Peachtree Street, NE, Rm. 4080
Atlanta, Georgia 30309
(AT & T)

Jocelyn G. Boyd, Esquire
Staff Attorney
S.C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)

Russell B. Shetterly, Esquire
P. O. Box 8207
Columbia, South Carolina 29202
(Knology of Charleston and Knology of South Carolina, Inc.)

Darra W. Cothran, Esquire
Woodward, Cothran & Herndon
1200 Main Street, 6th Floor
Post Office Box 12399
Columbia, South Carolina 29211
(MCI WorldCom Network Service Inc.
MCI WorldCom Communications and
MCI metro Access Transmission Services, Inc.)

John F. Beach, Esquire
John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P. A.
Post Office Box 2285
Columbia, South Carolina 29202
(Resort Hospitality Services, Inc., NuVox Communications, Inc.,
AIN and Momentum Business Solutions, Inc.)

Marsha A. Ward, Esquire
Kennard Woods, Esquire
MCI WorldCom, Inc.
Law and Public Policy
6 Concourse Parkway, Suite 3200
Atlanta, Georgia 30328
(MCI)

Genevieve Morelli
Kelley, Drye & Warren, LLP
1200 19th Street, N.W.
Washington, D.C. 20036
(KMC Telecom III, Inc.)

John D. McLaughlin, Jr.
Director, State Government Affairs
KMC Telecom, Inc.
1755 North Brown Road
Lawrenceville, GA 30043
(KMC Telecom)

Jack Derrick, Esquire
141111 Capital Blvd.
Wake Forest, NC 27587-5900
(Sprint/United Telephone)

Scott A. Elliott, Esquire
Elliott & Elliott
721 Olive Street
Columbia, South Carolina 29205
(Sprint/United Telephone)

Marty Bocock, Esquire
Director of Regulatory Affairs
1122 Lady Street, Suite 1050
Columbia, South Carolina 29201
(Sprint/United Telephone Company)

Faye A. Flowers, Esquire
Parker Poe Adams & Bernstein LLP
1201 Main Street, Suite 1450
Columbia, South Carolina 29202

Andrew O. Isar
Director – State Affairs
7901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335
(ASCENT)

Nanette Edwards, Esquire
ITC DeltaCom Communications, Inc.
4092 S. Memorial Parkway
Huntsville, Alabama 35802

Timothy Barber, Esquire
Womble, Carlyle, Sandridge & Rice
3500 One Wachovia Center
301 South College
Suite 3500
Charlotte, North Carolina 28202
(AT & T)

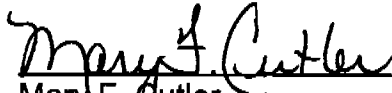
Tami Azorsky, Esquire
McKenna & Cuneo, LLP
1900 K Street, N.W.
Washington, DC 20006
(AT & T)

William Prescott, Esquire
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, Georgia 30309
(AT & T)

Patrick Turner, Esquire
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201
(BellSouth Telecommunications, Inc.)

Robert E. Tyson, Jr.
Sowell Gray Stepp & Laffitte, L.L.C.
Post Office Box 11449
Columbia, South Carolina 29211
(Competitive Carriers of the South, Inc.)

Dated at Columbia, South Carolina this 27th day of May, 2005.



Mary F. Cutler